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**LATHAM & WATKINS LLP**

February 2, 2022

**VIA ECF**

Honorable John G. Koeltl  
 United States District Judge  
 Southern District of New York  
 500 Pearl Street  
 New York, New York 10007

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Re: United States v. Hayes, et al., 20 Cr. 500 (JGK)

Dear Judge Koeltl:

Defendants Arthur Hayes, Benjamin Delo, and Samuel Reed write to propose the following schedule regarding expert witness disclosures and related briefing: (i) simultaneous exchange of expert disclosures by February 11, 2022; (ii) simultaneous motions to exclude experts by February 26, 2022; and (iii) simultaneous oppositions to any motions to exclude by March 7, 2022. The government consents to this schedule.

Respectfully submitted,

/s/ Douglas K. Yatter  
 Douglas K. Yatter  
 Benjamin Naftalis  
 of LATHAM & WATKINS LLP

cc: All Counsel of Record (via ECF)

SO ORDERED.

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HON. JOHN G. KOELTL  
 UNITED STATES DISTRICT JUDGE